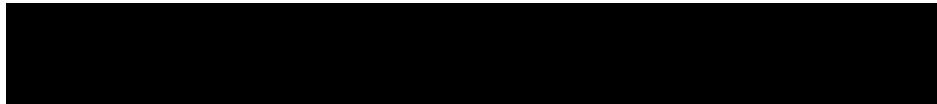


# EXHIBIT 7



1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF TEXAS  
3 MARSHALL DIVISION

4 HEADWATER RESEARCH LLC, )  
5 )  
6 Plaintiff, )  
7 VS ) Case No.  
8 ) 2:23-CV-00641  
9 SAMSUNG ELECTRONICS CO., )  
10 LTD and SAMSUNG )  
11 ELECTRONICS AMERICA, INC., )  
12 )  
13 Defendants. )

14 REMOTE VIDEOTAPED DEPOSITION OF

15 JEFFREY GREEN

16 February 22, 2025

17  
18  
19  
20  
21  
22 Job No. 570052

23 Pages 1 - 99

24 Stenographically Reported by:

25 Susan S. Klinger, RMR-CRR, CSR

Transcript of Jeffrey Green  
Conducted on February 22, 2025

25

1	A Not directly. He reported indirectly.	10:29:33
2	Q Could you explain that, please?	10:29:41
3	A Yeah. There was an individual called	10:29:43
4	Laurent Nguyen whose sort of team led and managed	10:29:48
5	the client, you know, handset team.	10:29:53
6	Q Could you repeat that name one more time	10:30:01
7	for me?	10:30:03
8	A Laurent Nguyen. So L-a-u-r-e-n-t	10:30:05
9	N-g-u-y-e-n.	10:30:14
10	Q So if I'm following correctly, then,	10:30:14
11	Mr. Phuong Nguyen was a member of the handset	10:30:27
12	engineering team?	10:30:30
13	A Yes, correct.	10:30:32
14	Q Would it surprise you if some of your	10:30:33
15	former colleagues at ItsOn described Mr. Phuong	10:30:43
16	Nguyen as a capable, competent and knowledgeable	10:30:46
17	software engineer?	10:30:49
18	A It wouldn't surprise me if he was	10:30:52
19	described that way.	10:30:54
20	Q Would you expect Mr. Nguyen to give honest	10:30:57
21	and truthful testimony in a deposition?	10:31:01
22	MR. KROEGER: Object to form. You can	10:31:04
23	answer.	10:31:06
24	A I have no reason to believe he wouldn't	10:31:06
25	based on my interactions with him.	10:31:11

Transcript of Jeffrey Green  
Conducted on February 22, 2025

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1	record. The time is 10:33.	10:33:10
2	(Recess, 10:33 to 10:34 a.m.)	10:33:12
3	VIDEOGRAPHER: We are back on the record.	10:34:22
4	The time is 10:34.	10:34:35
5	Q Mr. Lavine was on the engineering team; is	10:34:37
6	that correct?	10:34:47
7	A Yes, he reported to me.	10:34:47
8	Q Was Mr. Lavine on the handset or platform	10:34:51
9	side of the engineering team?	10:34:57
10	A Neither. He was, as I said, sort of	10:34:59
11	earlier he was responsible for working with the	10:35:04
12	carriers that we were engaged with and working	10:35:07
13	with the engineering team, so he was kind of like	10:35:10
14	the conduit.	10:35:12
15	Q And did Mr. Lavine report directly to you?	10:35:14
16	A He did.	10:35:17
17	Q Would it surprise you if your former ItsOn	10:35:18
18	colleagues described Mr. Lavine as a capable,	10:35:28
19	competent and knowledgeable software engineer?	10:35:32
20	A It would not surprise me.	10:35:36
21	Q Was Mr. Lavine knowledgeable of	10:35:37
22	application programming interfaces?	10:35:45
23	A Yes.	10:35:47
24	Q Was Mr. Lavine knowledgeable with	10:35:48
25	measuring or tracking network usage data?	10:35:53

Transcript of Jeffrey Green  
Conducted on February 22, 2025

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1	8,639,811 or the '811 patent.	11:00:12
2	Please let me know when you can see that.	11:00:21
3	MR. KROEGER: Steffen, we have been going	11:00:32
4	for about an hour. Would it be a good time for a	11:00:34
5	break sometime soon?	11:00:37
6	MR. LAKE: We can take a break now.	11:00:38
7	MR. KROEGER: 10 minutes?	11:00:39
8	MR. LAKE: Sounds great.	11:00:40
9	VIDEOGRAPHER: We are going off the	11:00:42
10	record. The time is 11:00 o'clock.	11:00:43
11	(Recess, 11:00 to 11:10 a.m.)	11:00:45
12	VIDEOGRAPHER: We are back on the record.	11:09:34
13	The time is 11:10.	11:09:58
14	Q Mr. Green, do you have Exhibit 3, the copy	11:10:01
15	of U.S. Patent Number 8,639,811?	11:10:08
16	A I do, yes.	11:10:13
17	Q You are not a named inventor on this	11:10:14
18	patent; is that correct?	11:10:19
19	A Correct.	11:10:20
20	Q Have you reviewed the '811 patent prior to	11:10:21
21	today?	11:10:26
22	A No, I have not.	11:10:26
23	Q Please take the time if you need it, but	11:10:28
24	could you please briefly describe the invention	11:10:34
25	described in this patent?	11:10:38

Transcript of Jeffrey Green  
Conducted on February 22, 2025

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1	A As far as I can tell from the limited	11:10:40
2	information on the abstract, my understanding is	11:10:49
3	that based on some level of user input would	11:10:57
4	determine a control policy on the wireless device	11:11:05
5	and that would control access to the -- the	11:11:11
6	wireless network and services.	11:11:17
7	Q Did you work on control policies for	11:11:22
8	access to wireless network and services that were	11:11:43
9	based on user input?	11:11:46
10	A Yes.	11:11:48
11	Q Who else on the engineering teams at ItsOn	11:11:51
12	would have worked on control policies for	11:11:56
13	controlling access to the wireless network and	11:12:02
14	services based on user input?	11:12:04
15	A That part of the client handset software	11:12:06
16	would have been worked on by most likely Laurent,	11:12:13
17	James and Nathan, and that is James Fitzgerald.	11:12:20
18	Q Would anyone from the platform or server	11:12:32
19	side of the engineering team have contributed to	11:12:36
20	this invention?	11:12:39
21	A I don't think so directly, no.	11:12:40
22	Q Did anyone other than Laurent, James	11:12:47
23	Fitzgerald or Nathan Huntsberger contribute to the	11:13:01
24	invention described in this patent?	11:13:05
25	MR. KROEGER: Object to form.	11:13:11

Transcript of Jeffrey Green  
Conducted on February 22, 2025

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1	A That is correct.	11:17:22
2	Q Have you reviewed the '359 patent prior to	11:17:24
3	today?	11:17:29
4	A I have not, no.	11:17:29
5	Q Could you briefly describe the invention	11:17:31
6	being described in this patent, the '359 patent?	11:17:38
7	MR. KROEGER: Object to form. You can	11:17:45
8	answer.	11:17:46
9	A Just give me a second, I'm reading the	11:17:46
10	abstract. (Reviewing document.)	11:17:49
11	It is describing how a policy can be	11:18:16
12	applied to a wireless circular network and wide	11:18:17
13	area network. Specifically it looks like more of	11:18:28
14	the wide area network.	11:18:30
15	Q Did you contribute to work regarding how	11:18:34
16	policies could be applied specifically to wireless	11:18:53
17	wide area networks?	11:18:56
18	A In terms of the types of policies,	11:18:59
19	probably. I don't recall exact specifics.	11:19:14
20	Q Who in the ItsOn engineering teams would	11:19:19
21	have contributed to work regarding how policies	11:19:30
22	could be applied specifically to wireless wide	11:19:33
23	area networks?	11:19:35
24	A It would be the same set of folks that I	11:19:36
25	mentioned earlier, Phuong, Nathan, maybe James	11:19:47

Transcript of Jeffrey Green  
Conducted on February 22, 2025

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1	Fitzgerald. They would have contributed to some	11:19:55
2	of the coding around that.	11:20:00
3	Q Was Mr. Lavine involved in working on	11:20:32
4	policies that could be applied specifically to	11: 0:36
5	wireless wide area networks?	11:20:39
6	A He could have been, yes.	11:20:43
7	Q What would the nature of his work have	11:20:46
8	been with regards to network policies affecting	11:20:55
9	wireless wide area networks?	11:20:59
10	A Jim may have been involved in some of the	11:21:03
11	design work around it. He wasn't hands on with	11:21:05
12	the keyboard coding, but he may have been involved	11:21:10
13	in the design thereof.	11:21:14
14	Q Would Alireza Raissinia have been involved	11:21:16
15	in work with network policies affecting work	11:21:27
16	involving wireless wide area networks?	11:21:29
17	A He may have been, I don't recall. Ali	11:21:32
18	wasn't with ItsOn -- I don't think we overlapped	11:21:40
19	very long at all if I recall correctly.	11:21:43
20	Q I'm sending in the chat function what will	11:21:45
21	be marked as Exhibit Number 5.	11:22:01
22	(Exhibit 5 marked.)	11:22:02
23	Q This is a copy of U.S. Patent Number	11:22:03
24	9,647,918, which I may refer to as the '918	11:22:08
25	patent.	11:22:13